

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN**

---

In Re:

TODD M. LEKAN,

Debtor.

Case No. 23-11768-cjf

Chapter 11

---

**NOTICE FOR HEARING ON APPROVAL OF TODD M. LEKAN'S  
DISCLOSURE STATEMENT DATED DECEMBER 16, 2024,  
AND SETTING TIME TO FILE OBJECTIONS TO DISCLOSURE STATEMENT  
DATED DECEMBER 16, 2024**

---

TO: All parties in interest:

A Disclosure Statement under Chapter 11 of the Bankruptcy Code was filed by Todd M. Lekan ("Debtor") on December 16, 2024.

**NOTICE IS HEREY GIVEN THAT:**

1. A final hearing to consider the approval of the Debtor's Disclosure Statement Dated December 16, 2024, will be held in Courtroom 350 of the Robert W. Kastenmeier U.S. Courthouse at 120 North Henry Street, Room 350, in the City of Madison, Wisconsin, 53703 on **JANUARY 23, 2025, at 10:00 a.m.**
2. The Court permits parties to appear at said hearing in accordance with the terms and provisions of the Court's Order and Instructions for Appearance by Zoom (Evidentiary Hearing) attached to this Notice for Hearing.
3. A copy of Debtor's Disclosure Statement Dated December 16, 2024 and Exhibits ("Disclosure Statement") are all attached to this Notice for Hearing.
4. Objections to the Disclosure Statement shall be filed in accordance with Rule 3017(a) by January 16, 2025.
5. All objections shall be made in writing, shall state the basis for the objection with specificity, shall be filed with the Clerk of the United States Bankruptcy Court at the address indicated above, and shall be served upon the undersigned attorney for the Debtor at the address set forth below, and the United States Trustee, located at 780 Regent Street, Suite 304, Madison, Wisconsin, 53715.

6. The Debtor, by its attorneys, shall transmit the Disclosure Statement and Exhibits to each member of a creditors committee appointed pursuant to Section 1102 of the Bankruptcy Code, if any, and to any party in interest who requests in writing a copy of the Disclosure Statement.

Dated this 18<sup>th</sup> day of December, 2024.

**KREKELER LAW, S.C.**

By: 

Noe J. Rincon  
State Bar No. 1124893  
Attorneys for Debtor,  
Todd M. Lekan

Address:

26 Schroeder Court, Suite 300  
Madison, WI 53711  
Phone: 608-258-8555  
Fax: 608-258-8299  
[nrincon@ks-lawfirm.com](mailto:nrincon@ks-lawfirm.com)

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN**

In Re:

Case Number: 3-23-11768-cjf  
Chapter: 11

Todd M Lekan

Debtor(s).

**ORDER AND INSTRUCTIONS FOR APPEARANCE BY ZOOM  
(Evidentiary Hearing)**

The Court set a hearing on 1/23/2025, at 10:00a.m. in Courtroom 350 of the Robert W. Kastenmeier U.S. Courthouse, 120 N. Henry Street, Madison, Wisconsin, on: Disclosure Statement. The Court has received a request to permit appearance by Zoom for specifically identified case parties. Pursuant to Rule 43(a) of the Federal Rules of Civil Procedure, as incorporated by Rule 9017 of the Federal Rules of Bankruptcy Procedure, the Court finds "good cause in compelling circumstances" to take testimony remotely using Zoom videoconferencing technologies due to the exigency of the matter and the locations of the parties and their counsel vis-à-vis the courthouse. The Court further finds that the procedures adopted herein will provide "appropriate safeguards" for purposes of Rule 43(a) and ensure due process of law. Accordingly,

**IT IS HEREBY ORDERED:**

1. **Request for Zoom Link**: If you are a Case Participant (a party, counsel, or witness in the case), you may ask the Court for permission to appear by Zoom at [zoomhearingrequest@wiwb.uscourts.gov](mailto:zoomhearingrequest@wiwb.uscourts.gov). Case Participants granted permission by the Court to appear by Zoom will receive an email containing a link to the hearing.

No later than 1/16/2025, Case Participants must provide to the courtroom deputy at [zoomhearingrequest@wiwb.uscourts.gov](mailto:zoomhearingrequest@wiwb.uscourts.gov) and to each other a list of all attorneys, parties, and witnesses who will participate in the evidentiary hearing, together with an email address and telephone number for each. The telephone number provided should be a number at which the attorney, party, or witness can be reached during the evidentiary hearing in the event of an interruption in the audio or video feed. This requirement is in addition to any requirements previously established by the Court for the parties to disclose to each other, by a date certain, the identity of the witnesses they intend to present at the evidentiary hearing.

2. **Observation Only**: Case Participants that wish to observe the hearing, but not participate, may appear using the Court's conference line at 1-855-244-8681, meeting number 23166492589. Any Case Participant appearing by telephone must identify themselves to the Court. Case Participants appearing by telephone may not examine a witness or introduce evidence; provided, however, with the Court's permission they may be permitted to make a brief statement.

**Anyone who is not a Case Participant, including the general public and the press, cannot appear by Zoom or telephone conference call, but they are welcome to attend the hearing in person.**

3. **Required Equipment**:
  - a. Each participant appearing by Zoom in the hearing must have access to: (i) a computer, tablet, or smartphone, equipped with a microphone and camera, that is capable of receiving and transmitting video and audio using Zoom; (ii) Internet browsing software that is adequate to facilitate Zoom; (iii) an Internet connection with bandwidth adequate to support the individual's use of Zoom; (iv) PDF Reader for purposes of viewing exhibits, as directed by counsel or the Court; and (v) a telephone for connecting to the Zoom telephone audio or the Court's conference line if the Zoom videoconference fails. The use of a good quality headset or headphones with a microphone is highly recommended.
  - b. If a participant is using a smartphone, the participant must be situated in a location with cellular service adequate to provide clear audio.

- c. The participant should avoid using battery power only for a laptop, tablet, or smartphone and should instead plug into a good power source throughout the hearing.
- d. Each participant must be located in a quiet room and must situate themselves in such a manner as to be able to both view the video feed and be seen by the Court.

4. Remote Witness Testimony:

- a. All remote witnesses shall be placed under oath and their testimony shall have the same effect and be binding upon the remote witness in the same manner as if such remote witness was sworn in and testifying in open court.
- b. While the remote witness is sworn and testifying: (i) no person may be present in the room from which the remote witness is testifying unless specifically authorized by the Court; (ii) the remote witness may not have in the room any documents except the exhibit(s) submitted by the parties; and (iii) may not communicate with any other person regarding the subject of their testimony, by electronic means or otherwise. If the witness or their counsel seek to communicate with one another, they shall openly request a recess for such purpose. The Court will recess for a specified amount of time and either ask the parties to mute their microphones and then leave the room to speak over the telephone or make such other arrangements as the Court may determine. The witness and counsel will be expected to be promptly back on video and with audio at the end of the recess period.
- c. The party sponsoring a remote witness shall be responsible for ensuring the remote witness understands the procedures in this Order. The sponsoring party is also responsible for ensuring the remote witness has obtained the link to the videoconference, has obtained all exhibits prior to the hearing, has registered with Zoom as applicable, and has equipment and internet service sufficient to permit participation via videoconference in the hearing.

5. Courtroom Formalities: Although conducted in part using videoconferencing technologies, the hearing constitutes a court proceeding. No person shall record, photograph, or rebroadcast—from any location or by any means—the audio or video of the hearing. Violation of these rules may result in the Court imposing sanctions on the offending party. The audio recording created and maintained by the Court shall constitute the official record of the hearing. Further, the formalities of a courtroom shall be observed. All participants shall dress appropriately, exercise civility, and otherwise conduct themselves in a manner consistent with the dignity of the Court and its proceedings.

6. Technical Difficulties: If a participant or the Court has technical difficulties on the day of the hearing, the Court may, at any time, convert the hearing from a videoconference hearing to a telephone hearing using the Court's conference line only.

7. Retention of Jurisdiction: The Court retains jurisdiction with respect to all matters arising from or related to this Order.

Dated: December 16, 2024

BY THE COURT:

/s/ Catherine J. Furay

---

Hon. Catherine J. Furay  
U.S. Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

In Re:

TODD M. LEKAN,

Debtor.

Case No. 23-11768-cjf

Chapter 11

---

CERTIFICATE OF SERVICE

---

The undersigned, being first duly sworn on oath, deposes and says that on December 18, 2024, the undersigned, Cheryl Watson, electronically filed with the Clerk of Court and served upon the United States Trustee, the Unsecured Creditors' Committee, the Debtor's attorney, and any other person designated by the Court using the ECF system, the following documents: (1) Notice of Hearing on Approval of Todd M. Lekan's Disclosure Statement Dated December 16, 2024, and Setting Time to File Objections to Disclosure Statement dated December 16, 2024, (2) Order and Instructions for Appearance by Zoom (Evidentiary Hearing), and (3) a copy of the Disclosure Statement of Todd M. Lekan dated December 16, 2024, with exhibits attached to:

U.S. Trustee's Office

Email: [USTPRegion11.MD.ECF@usdoj.gov](mailto:USTPRegion11.MD.ECF@usdoj.gov)

Jennifer K. Niemeier, on behalf of Office of the United States Trustee

Email: [Jennifer.Niemeier@usdoj.gov](mailto:Jennifer.Niemeier@usdoj.gov)

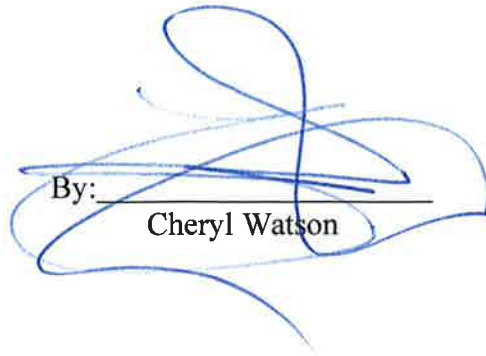
Brian P. Thill, on behalf of Office of the United States Trustee

Email: [BrianP.Thill@usdoj.gov](mailto:BrianP.Thill@usdoj.gov)

The undersigned, being first duly sworn on oath, deposes and says that on December 18, 2024, the undersigned mailed, properly enclosed in a postpaid envelope, a copy of the: (1) Notice of Hearing on Approval of Todd M. Lekan's Disclosure Statement Dated December 16, 2024, and Setting Time to File Objections to Disclosure Statement dated December 16, 2024, (2) Order and Instructions for Appearance by Zoom (Evidentiary Hearing), and (3) a copy of the Disclosure Statement of Todd M. Lekan dated December 16, 2024, with exhibits attached to all on the attached list and to:

Internal Revenue Service  
ATTN: Erica Highbaugh  
575 N Pennsylvania Street  
M/S SB380  
Indianapolis, IN 46204

Todd M. Lekan  
333 Brown Deer Road  
Unit G-1911  
Milwaukee, WI 53217

By:   
Cheryl Watson

abel Matrix for local noticing  
758-3  
ase 3-23-11768-cjf  
estern District of Wisconsin www.wiwb.uscour  
adison  
ed Dec 18 11:36:00 CST 2024

p)US BANK  
O BOX 5229  
INCINNATI OH 45201-5229

RS - Centralized Insolvency Operations  
.O. Box 7346  
Philadelphia, PA 19101-7346

arissa Metelica & Jason Reif  
34 Halsey St., #1  
Brooklyn, NY 11207-1016

ennifer K Niemeier  
ffice of the United States Trustee  
30 Regent Street, Suite 304  
Madison, WI 53715-1233

oe Joseph Rincon  
rekeler Law S.C.  
5 Schroeder Court, Suite 300  
Madison, WI 53711-2503

ristin J. Sederholm  
rekeler Law, S.C.  
5 Schroeder Court, Suite 300  
Madison, WI 53711-2503

.S. Trustee's Office  
30 Regent Street, Suite 304  
Madison, WI 53715-1233

isconsin Department of Revenue  
pecial Procedures Unit  
.O. Box 8901  
Madison, WI 53708-8901

Capital One  
PO Box 4069  
Carol Stream IL 60197-4069  
  
Fidelity  
Cardmember Services  
PO Box 790408  
Saint Louis, MO 63179-0408

Internal Revenue Service  
Bankruptcy Notices  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Murphy Desmond S.C.  
P.O. Box 2038  
Madison, WI 53701-2038

Office of the United States Trustee  
780 Regent Street  
Suite 304  
Madison, WI 53715-1233

Secretary of Treasury  
Treasury Department  
1500 Pennsylvania Avenue N.W.  
Washington, DC 20220-0001

Brian P. Thill  
Office of the United States Trustee  
780 Regent Street  
Suite 304  
Madison, WI 53715-1233

US Cellular  
PO Box 0203  
Palatine, IL 60078-0203

Wisconsin Department of Revenue  
ATTN: Bankruptcy Unit, MS 5-144  
PO Box 8901  
Madison, WI 53708-8901

Capital One, N.A.  
by AIS InfoSource LP as agent  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Heather Leaken  
1579 S. Commercial St  
Neenah, WI 54956-4855

Todd M Lekan  
333 Brown Deer Road  
Unit G-1911  
Milwaukee, WI 53217-2372

Nicolet National Bank  
fka Advantage Community Bank  
210 N 17th Avenue  
Wausau, WI 54401-4223

Nicole I. Pellerin  
33 East Main Street Suite 500  
P.O. Box 2038  
Madison, WI 53701-2038

Securities and Exchange Commission  
175 West Jackson Boulevard  
Suite 900  
Chicago, IL 60604-2908

U.S. Bank NA dba Elan Financial Services  
Bankruptcy Department  
PO Box 108  
Saint Louis, MO 63166-0108

United States Treasury  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Wisconsin Dept. of Workforce Development  
Division of Unemployment Insurance  
P.O. Box 8914  
Madison, WI 53708-8914

ardmember Service  
.O. Box 790408  
aint Louis, MO 63179-0408

(d)Elan Financial Services  
Bankruptcy Department  
P.O. Box 5229  
Cincinnati, OH 45201

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

1)Alexandria Lekan

End of Label Matrix	
Mailable recipients	26
Bypassed recipients	1
Total	27